1	Bird & Van Dyke, Inc.		
2	A Professional Law Corporation David S. Van Dyke, CABN 154402		
3	Mary Ann F. Bird, CABN 206770 2111 W. March Lane		
4	Suite B300		
5	Stockton, CA 95207 Telephone 209.414.3266		
6	Facsimile 209.414.3268 Attorneys for Defendant ENRIQUE NAVARRO VILLA		
7			
8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10	THE UNITED STATES OF AMERICA,	Case No.: 2:23 CR 00113 DJC; 2:23 CR 00073	
11	Plaintiff,	DJC	
12	vs.		
13		STIPULATION AND ORDER TO CONTINUE JUDGMENT AND SENTENCING HEARING	
14	ENRIQUE NAVARRO VILLA,		
15	Defendant.		
16			
17 18	STIPULATION		
19	Plaintiff, United States of America, by and through its counsel of record, Assistant United States		
20			
21	Attorney Robert Abendroth, and the Defendant, by and through his counsel of record, Mary Ann F. Bird, hereby stipulate as follows:		
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23	1. On January 23, 2025, Defendant pled guilty to Count 3 of the Indictment under docket		
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25	2:23 CR 00113 and to Count 6 of the Indictment under docket 2:23 CR 00073. The matters was referred to the Probation Office for preparation of the pretrial investigation		
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27	reports for both dockets. The matters are presently set for judgment and sentencing on		
28	May 1, 2025.		
	BIRD & VAN DYKE, INC. STIPULATION AND ORDER RE: RESETTING OF JU PAGE: 1	DGMENT AND SENTENCING	

- 2. Defense notified the Government of the need for additional time to gather, analyze and present information relevant to the Court's consideration of the 18 U.S.C 3553(a) factors before the imposition of sentence. Having considered defense counsel's request, the Government has no opposition to the requested date. Similarly, US Probation also has no opposition to this request.
- 3. Therefore, by this stipulation, defense respectfully requests that this Court continue the judgment and sentencing hearing until August 14, 2025 at 10:00 AM.
- 4. The parties further agree and stipulate to the following:
 - a) July 03, 2025: Draft PSR
 - b) July 17, 2025: Informal objections
 - c) July 24, 2025: Final PSR
 - d) July 31, 2025: Corrections
 - e) August 7, 2025: Replies
- 5. Because the Defendant has pled guilty, the provisions of the Speedy Trial Act do not apply to this request.

1	IT IS SO STIPULATED.	Respectfully submitted,
2	Dated: April 7, 2025	MICHELE BECKWITH
3		Acting United States Attorney
4		/s/ Robert Abendroth ROBERT ABENDROTH
5		Assistant United States Attorney
6		
7	Dated: April 7, 2025	/s/ Mary Ann F. Bird MARY ANN F. BIRD
8		Attorney for ENRIQUE NAVARRO VILLA
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10		
11	FINDINGS AND ORDERS	
12	The Court hereby continues the judgment and sentencing hearing to August 14, 2025 at	
14	9:00 AM. All dates previously set for the preparation of the Presentence Investigation Report and	
15	for the filing of documents with the Court are reset according to the parties' stipulation.	
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17	IT IS SO ORDERED.	
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19	Dated: April 7, 2025	/s/ Daniel J. Calabretta THE HONORABLE DANIEL J. CALABRETTA
20		UNITED STATES DISTRICT JUDGE
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